

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

JULIAN A. MILLER

Plaintiff,

v.

STANLEY TAYLOR, ET. AL

Defendants,

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C.A. No. 04-1367

JURY OF 12 DEMANDED

**DEFENDANT ALIE’S REPLY IN SUPPORT OF HER MOTION FOR RELIEF FROM
DEFAULT JUDGMENT**

1. Plaintiff granted Defendant Alie an extension to answer the complaint until August 25, 2006.

2. On August 24, 2006, this Court granted Plaintiff’s Default Judgment motion against Defendant Alie.

3. On August 24, 2006, counsel for Defendant Alie spoke with plaintiff’s counsel regarding a Motion to Vacate Default Judgment. During that telephone conversation, plaintiff’s counsel stated he would not oppose such a motion.

4. On August 24, 2006, Defendant Alie filed a Motion for Relief From Default Judgment.

5. As the Court’s decision regarding the vacation of default judgment is still pending, Defendant Alie did not file an answer. However, for the ease of all parties, Defendant Alie has attached a proposed answer which would be filed, should the default judgment against her be lifted

by this Court. Proposed Answer attached as "Exhibit 1."

6. For the above mentioned reasons, Defendant Alie respectfully requests that the default judgment against her be lifted and that the Court enter an order granting her Motion for Relief from Default Judgment.

McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar No. 2689

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Attorneys for Defendant Dr. Alie

September 18, 2006

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CERTIFICATE OF SERVICE

I, **DANA SPRING MONZO**, hereby certify that on the 18th day of September, 2006, a copy of the attached *Defendant Alie's Reply in Support of Her Motion for Relief from Default Judgment* was sent to the following via electronic notification:

Sean P. Hayes, Esquire
Fish & Richardson, P.C.
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